

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, <i>et al.</i>,¹	§	Case No. 20-33948 (MI)
	§	
Debtors.	§	(Jointly Administered)
	§	

NOTICE OF PROPOSED SCHEDULE

PLEASE TAKE NOTICE that, in advance of the April 1, 2021 discovery conference, attached hereto as **Exhibit A** is the sureties' proposed schedule for discovery, briefing and other deadlines. For the Court's ease of reference, Exhibit A sets forth a side-by-side of the Debtors' proposed dates versus the sureties' proposed dates.

¹ The Debtors, each of which have filed a separate voluntary petition, are: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

Dated: April 1, 2021

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Timothy A. Million

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CERTIFICATE OF SERVICE

I certify that on April 1, 2021, a copy of this document was served by electronic service on all counsel of record *via* the Court's CM/ECF system.

/s/ Timothy A. Million

Timothy A. Million

EXHIBIT A

PROPOSED SCHEDULE

Event/Deadline	Debtors' Proposed Date(s)	Sureties' Proposed Date(s)
Discovery Conference	4/1/21	4/1/21
Hearing – Planning Meeting re Disclosure Statement Hearing	n/a	4/9/21
Deadline to Serve Discovery Requests	4/5/21	4/14/21
Disclosure Statement Hearing	4/14/21	4/14/21
Completion of Document Production	4/21/21	4/30/21
Completion of Responses to All Other Discovery Requests	n/a	4/30/21
Expert Disclosure/Expert Report Deadline (for party with initial burden of proof)	4/28/21	5/21/21
Fact Witness Depositions	4/28/21 - 5/10/21	5/21/21 – 6/11/21
Rule 3018(a) Motion Deadline	4/13/21	6/11/21
Request for Estimation Deadline	4/13/21	6/11/21
Rebuttal Expert Reports	5/10/21	6/21/21
Expert Witness Depositions	4/30/21 – 5/10/21	6/21/21 – 7/2/21
Plan Supplement Filing Deadline	4/16/21	6/25/21
Voting Deadline	4/26/21	7/7/21
Deadline to File Confirmation Objections	5/7/21	7/7/21
Ballot Certification Deadline	4/28/21	7/9/21
Deadline to File Confirmation Brief and Reply to Plan Objections	5/14/21	7/12/21
Confirmation Hearing	5/17/21	7/14/21